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IMMUNITY OF DIPLOMATIC AGENTS. — It is well settled that a sovereign who visits a foreign country is free in respect to his person from all local jurisdiction. And to describe his precise legal position the term extra-territoriality is used, by which the monarch is conceived as being a portion of the state to which he belongs, though actually in the foreign country. Though it may well be true that in case of a sovereign or of the ambassador who is identified with him the immunity and the term which describes it are co-extensive, this picturesque metaphor must be regarded as a fiction of vivid description rather than a legal rule. The expression really becomes dangerous when it is used to account for the exemption from local laws of the suite, attachés and servants of a foreign minister. It would seem that the ambassador is entitled to their immunity because they are a necessary aid to him in his ministerial duties. And the exemption of these people who cannot be said to be identified with their sovereign extends only so far as is compatible with their usefulness in their official capacity. But it is clear that if an attaché commits murder the courts of the country to which he is accredited are powerless to punish him. The most that can be done is to apply for his recall to the State he represents. Hall, *International Law*, 3d ed., p. 168. Dana, *Wheaton's International Law*, 8th ed., § 225. When, however, he kills himself it is doubtful what course may be adopted. A step towards settling this doubt has just been taken in the case of Count Karolyi, an attaché of the Austro-Hungarian Embassy, noted in *The Law Journal*, Jan. 14th, 1899. The count committed suicide in Piccadilly and an inquest was held on his dead body. No objection was made to the interference of the English coroner, because the count was not a resident of the Embassy house, and therefore it was said that the privilege of extra-territoriality did not exist. The reason given is manifestly erroneous in applying a term of description as a legal rule. If anything can correctly be termed extra-territorial! it is the person of the minister himself and not his dwelling. But the point raised is interesting. The very act which was wrongful terminated his office by ending his life. His usefulness to his country was ended — the public rights which had formerly attached to him had ceased to exist. Why should not his remains be subject to foreign jurisdiction? And yet a state has a right to demand the safe return of her diplomat whose term has expired. If the home office had expressly desired the return of the dead body without interference England no doubt as a matter of policy would have refrained from holding an inquest. But in the absence of such request her action can be sustained on the ground that, while an ultimate return of the remains is of course necessary, there is no reason why the ordinary course of procedure should not be invoked where the person of the attaché has lost all its public character.

CONSTRUCTIVE TRUSTS. — Equity, speaking strictly, never gives damages for an injury; rather it lays its command on the wrongdoer to make reparation for his wrong. It concerns itself not with what the complainant lost but with what the respondent gained, and in all cases where it has jurisdiction will force the wrongdoer to hold the proceeds of his wrong, no matter in what shape they then exist, for the benefit of his victim. But in the looser modern equity practice those fundamental principles, so clearly in line with natural justice, are often forgotten by both courts and complainants; it is refreshing then to come upon a case like